

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**REVISED RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN
(December 12, 1997)**

The United States Postal Service hereby files these revised responses to the following interrogatories of David Popkin: DBP/USPS-58(d) and DBP/USPS-97(h). The revised responses supersede the original responses, filed on November 14, 1997, and December 8, 1997, respectively.

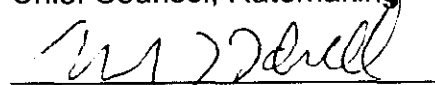
Each interrogatory is stated verbatim and is followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making



Michael T. Tidwell

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**REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID POPKIN**

DBP/USPS-58(d)

At what point did the Postal Service eliminate the addition of phosphor ink on stamps with a value of less than 10 cents?

RESPONSE:

During 1988.

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DBP/USPS-97

Refer to your response to subpart (u) of DBP/USPS-6. (a) Does this mean that if there was a weather forecast predicting disruptive adverse weather conditions then the Postal Service should make the collection early? (b) Explain your response to subpart (a). (c) Out of all the collection boxes and all of the collection times for each of the boxes throughout all the country, approximately what percentage of these would have to be collected early in anticipation of disruptive adverse weather conditions? (d) Approximately what percentage would have to be collected early for any other exigent circumstances? (e) Elaborate on what might result in the early collections referred to in subpart (d). (f) Are you stating that the collection times of all boxes throughout the country should be changed to 12:01 AM so that in the event that there was exigent circumstances to collect mail early, such as in anticipation of disruptive adverse winter weather conditions, there would not be a failure for that box by collecting it early? (g) If so, explain how this would meet the conditions of the level of service contemplated by the referenced sections of the POM. (h) If not, provide a meaningful response to subparts (t) and (u) which relates to the normal conditions and not to the rare occurrence of some emergency condition.

RESPONSE:

- a. No.
- b. It means that a post office could make the collection early.
- c. The question asks what percentage "would have to be" collected early under the conditions described in part (a). In light of the response to part (b), the response to this question is none, since there is no early collection requirement under conditions described in part (a).
- d. See the response to part (c).
- e. There is no policy of mandatory early collection in anticipation of exigent circumstances. Therefore, it is impossible to elaborate on "what might result in the non-existent mandatory early collections referred to in subpart (d).
- f. No.

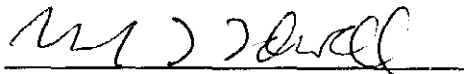
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Response to DBP/USPS-97 (continued)

- g. N/A
- h. Insert "also" after "may" in the first line of the response and it can be read to cover both "normal" and "rare" circumstances.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", is written over a horizontal line.

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December 12, 1997